

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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In re:

Chapter 11

PENNY ANN BRADLEY,

Case No.: 18-10122 (JLG)

Debtor.  
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**“LAR DAN” DECLARATION OF STEVEN D’ADDONE,  
ON BEHALF OF RIDGE RESTORATION, INC., IN CONNECTION WITH THE  
RETENTION OF LAMONICA HERBST & MANISCALCO, LLP AS SPECIAL  
COUNSEL FOR THE DEBTOR AND DEBTOR-IN-POSSESSION**

Steven D’Addone, being duly sworn, deposes and declares as follows:

1. I am a shareholder of Ridge Restoration, Inc. (“Ridge”).
2. I submit this declaration in connection with the application of Penny Ann Bradley, the Chapter 11 debtor and debtor-in-possession (the “Debtor”) seeking to retain LaMonica Herbst & Maniscalco, LLP (“LH&M”) as special counsel in her bankruptcy case.
3. Ridge paid the sum of \$50,000 to LH&M on behalf of the Debtor. The foregoing funds were paid an advanced retainer so that LH&M could represent the Debtor in her pending Chapter 11 case.
4. LH&M has advised me, and I acknowledge that, with regard to any matters which LH&M is engaged, or to be engaged, in the context of this Chapter 11 case, and to the extent that the interest of the Debtor differs from my interests or that of Ridge, that LH&M shall represent the Debtor only and not me or Ridge.
5. I further acknowledge that LH&M owes a duty of undivided loyalty to the Debtor only. In that regard, I have been advised by LH&M that if a conflict of interest should arise, that I would be required to retain independent counsel on behalf of myself or Ridge in connection

with this matter. I have been advised, and fully understand, that LH&M will not represent me or Ridge with respect to any potential claims that I or Ridge may have against the Debtor.

6. LH&M has not previously represented, nor does it presently represent me. Further, LH&M does not owe any money to me or Ridge. Finally, neither Ridge or I owe any money to LH&M.

7. Ridge has maintained a business relationship, and been an occasional partner, with the Debtor. Ridge has acted as a general contractor on the Debtor's development projects and will continue to perform on construction contracts that Ridge has signed with the Debtor.

8. I do intend to file a proof of claim against the Debtor's estate with respect to the aforementioned advanced retainer fee loaned to the Debtor.

Dated: June 7, 2019

**Ridge Restoration, Inc.**

By: s/ Steven D'Addone  
Steven D'Addone, member